

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: TRICOR DIRECT PURCHASER
ANTITRUST LITIGATION

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)
) C.A. No. 05-340 (KAJ)
)
)

THIS DOCUMENT RELATES TO:
ALL ACTIONS
C.A. No. 05-340 (Louisiana Wholesale)
C.A. No. 05-351 (Rochester Drug)
C.A. No. 05-358 (Meijer, Inc., et al.)

)
) Hon. Kent Jordan, U.S.D.J.
)
) HIGHLY CONFIDENTIAL --
) FILED UNDER SEAL
) PURSUANT TO COURT ORDER
)
)

DECLARATION OF JEFFREY S. GODDESS, ESQ.
(PUBLIC VERSION)

JEFFREY S. GODDESS, ESQ. does hereby declare the following:

1. I am a partner in the firm of Rosenthal, Monhait & Goddess, P.A., counsel for plaintiffs in this matter. I submit this Declaration in conjunction with Direct Purchaser Class Plaintiffs' Opening Brief In Support of Their Motion for Class Certification.
2. Attached hereto as Exhibit "A" is a true and correct copy of the transcript of the Deposition of Joseph Edward Fiske, Abbott Laboratories' Rule 30(b)(6) designee, dated April 21, 2006 (Fiske Deposition).
3. Attached hereto as Exhibit "B" is a true and correct copy of the Declaration of Jeffrey J. Leitzinger, Ph.D., dated May 8, 2006, with exhibits.
4. Attached hereto as Exhibit "C" is a true and correct copy of a document stamped Tricor0260-66, bearing the date September 26, 1996.
5. Attached hereto as Exhibit "D" is a true and correct copy of a document stamped Abbott_Tricor01243-46, which was marked as Exhibit 12 during the Fiske Deposition.

6. Attached hereto as Exhibit "E" is a true and correct copy of the telephonic hearing transcript of March 3, 2006, before this Court.

7. Attached hereto as Exhibit "F" is a true and correct copy of the resume of the firm Garwin Gerstein & Fisher, LLP.

8. Attached hereto as Exhibit "G" is a true and correct copy of the resume of the firm Berger & Montague, P.C.

9. Attached hereto as Exhibit "H" is a true and correct copy of the resume of the firm Odom & Des Roches, LLP.

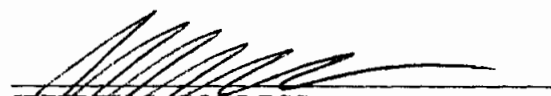
10. Attached hereto as Exhibit "I" is a true and correct copy of the resume of the firm Percy, Smith & Foote, LLP.

11. Attached hereto as Exhibit "J" is a true and correct copy of the resume of the firm Cohen, Milstein, Hausfeld & Toll, PLLC.

12. Attached hereto as Exhibit "K" is a true and correct copy of the firm Rosenthal, Monhait & Goddess, P.A.

13. Attached hereto as Exhibit "L" is a true and correct copy of a document stamped Abbott_Tricor0935-52, entitled " REDACTED ," which was marked as Exhibit 17 at the Fiske Deposition.

I am signing this Declaration under penalty of perjury.


JEFFREY S. GODDESS
(Del. Bar No. 630)